

238 South Wolfe Street
Baltimore, MD 21231
November 8, 2006



Commissioner of Patents and Trademarks
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

ATTN: Alicia M. Torres

Dear Ms. Torres,

I am submitting these papers in response to your Final Office Action, mailed on September 13, 2006, rejecting all claims of U.S. Patent Application No. 10/715,192. I hereby request continued examination of the application pursuant to 37 C.F.R. § 1.114 (see enclosed Form PTO/SB/30), and have amended the claims present new arguments for patentability of the invention embodied therein as indicated below. Enclosed are an introductory remarks section and a copy of the claims as currently amended or previously presented in the response to the first Office Action dated July 10, 2006.

In compliance with 37 C.F.R. § 1.121, no paragraphs of the amended specification presented on July 10, 2006 have been included, since there are no further amendments to the specification at this time. Furthermore, no amendments have been made to any of the drawings since that time, so no drawing papers are submitted herewith. The currently amended and previously presented claims are in compliance with 37 C.F.R. § 1.121(c). No new matter is contained in this response.

The requirements of 35 U.S.C. § 1.32(b) as promulgated in 37 C.F.R. § 1.114 are met by virtue of the fact that (a) prosecution of the application is closed by virtue of (b) the Final Office Action mailed on September 13, 2006. Pursuant to 37 C.F.R. § 1.114(c), this submission includes new amendments to the claims and new arguments for patentability of the invention embodied in the application.

Claim Objections

Claim 18 has been amended by striking the phrase, "to which said rotary cutting apparatus is affixed," which had previously modified the term "chassis," which, as you noted, is claimed as an element of the rotary cutting apparatus and therefore cannot serve as an object to which said apparatus may be affixed.

Claim Rejections – 35 U.S.C § 112

Claim 35 has been amended by striking the word "robotic" and replacing it with the term "self-guiding." You correctly noted that the original disclosure filed on March 3, 2004, did not disclose a means for effecting movement of the rotary cutting apparatus that is robotic. However, the original disclosure did describe an embodiment of the rotary cutting apparatus that is self-guiding. Therefore, by striking "robotic" and